

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES)
CORPORATION,)
)
Plaintiff,) C.A. No. 16-122-LPS-CJB
)
v.) **JURY TRIAL DEMANDED**
)
GROUPON, INC.)
)
Defendant.)

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5 and the attached certifications counsel moves the admission pro hac vice of John M. Desmarais, Karim Oussayef and Robert C. Harrits of DESMARAIS LLP, 230 Park Avenue, New York, NY 10169 to represent Plaintiff International Business Machines Corporation in this matter.

POTTER ANDERSON & CORROON LLP

By: /s/ Bindu A. Palapura
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyrne@potteranderson.com

*Attorneys for Plaintiff
International Business Machines Corporation*

Dated: March 15, 2016
1218540 / 42141

ORDER GRANTING MOTION

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is granted.

Date: _____

United States District Judge

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of New York and the District of Columbia and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

In accordance with Standing Order for District Court Fund effective 7/23/09, I further certify that the annual fee of \$25.00

has been paid to the Clerk of the Court.

will be submitted to the Clerk's Office upon the filing of this motion.

Date: March 15, 2016

Signed: /s/ John M. Desmarais

John M. Desmarais
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400
jdesmarais@desmaraisllp.com

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of New York and the Commonwealth of Massachusetts and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

In accordance with Standing Order for District Court Fund effective 7/23/09, I further certify that the annual fee of \$25.00

has been paid to the Clerk of the Court.

will be submitted to the Clerk's Office upon the filing of this motion.

Date: March 15, 2016

Signed: /s/ Karim Oussayef
Karim Oussayef
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400
koussayef@desmaraisllp.com

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of New York and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

In accordance with Standing Order for District Court Fund effective 7/23/09, I further certify that the annual fee of \$25.00

has been paid to the Clerk of the Court.

will be submitted to the Clerk's Office upon the filing of this motion.

Date: March 15, 2016

Signed: /s/ Robert C. Harrits

Robert C. Harrits
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400
rharrits@desmaraisllp.com